REMARKS

The Office Action mailed November 7, 2008 has been received and reviewed. Each of claims 28 and 30-63 stands rejected. Claims 28, 30, 34, 38, 40, and 52 have been amended herein. Care has been exercised to introduce no new subject matter. Support for the amendments can be found, for example, at ¶¶ [16], [42], [50], [61], and FIG. 4. Reconsideration of the above-identified application in view of the above amendments and the following remarks is respectfully requested.

Rejections based on 35 U.S.C. § 103(a)

A.)   Applicable Authority

The basic requirements of a *prima facie* case of obviousness are summarized in MPEP §2143 through §2143.03. In order "[t]o establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success [in combining the references]. Finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)". *See* MPEP §2143. The Supreme Court in *Graham v. John Deere* counseled that an obviousness determination is made by identifying: the scope and content of the prior art; the level of ordinary skill in the prior art; the differences between the claimed invention and prior art references; and secondary considerations. *Graham v. John Deere Co.,*

383 U.S. 1 (1966). To support a finding of obviousness, the initial burden is on the Office to apply the framework outlined in *Graham* and to provide some reason, or suggestions or motivation found either in the prior art references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the prior art reference or to combine prior art reference teachings to produce the claimed invention. *See, Application of Bergel,* 292 F. 2d 955, 956-957 (1961).

Recently, the Supreme Court elaborated, at pages 13-14 of the KSR opinion, that "it will be necessary for [the Office] to look at interrelated teachings of multiple [prior art references]; the effects of demands known to the design community or present in the marketplace; and the background knowledge possessed by [one of] ordinary skill in the art, all in order to determine whether there was an apparent reason to combine the known elements in the fashion claimed by the [patent application]." KSR v. Teleflex, 127 S. Ct. 1727 (2007). Further, in establishing a prima facie case of obviousness, the initial burden is placed on the Examiner. "To support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references. Ex parte Clapp, 227 USPQ 972, 972 (Bd. Pat. App. & Inter. 1985)." Id. See also MPEP §706.02(j) and §2142.

B.) **Obviousness Rejection Based on U.S. Publication No. 2003/0046567 to Carman et al., in view of U.S. Publication No. 2004/0215278 to Stegink et al.**

Claims 28, 30-35, 40-47 and 52-59 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Publication No. 2003/0046567 to Carman (hereinafter the "Carman reference") in view of U.S. Publication No. 2004/0215278 to Stegink et al. (hereinafter the

"Stegink reference"). As the Carman reference and the Stegink reference, whether taken alone or in combination, fail to teach or suggest all of the features of each of the rejected claims, a *prima facie* case of obviousness has not been established, and Applicant therefore respectfully traverses this rejection, as hereinafter set forth.

Independent claim 28, as amended herein, is generally directed to a method for creating a user profile. The method includes detecting a connection of a Portable Storage Device (PSD) to a computing device; and upon detecting the connection of the PSD, scanning the PSD for an indication of an existing user profile containing data files, application settings and user environment settings, wherein the user environment settings comprise a user's desktop configuration, start menu configuration or other operating system shell configurations. The method further includes, in response to detecting that no existing user profile is found on the PSD, automatically launching a user profile connection wizard that enables the user to create a user profile on the PSD. Additionally, the method includes receiving input from the user profile configuration wizard from the user selecting which content data will be synchronized between the PSD and the computing device, storing the selected content data on the PSD in association with a new user profile, and in response to the user input, synchronizing the selected content data between the PSD and the computing device.

It is respectfully submitted that the Carman reference fails to teach or suggest, detecting a connection of a Portable Storage Device (PSD) to a computing device; and upon detecting the connection of the PSD, scanning the PSD for an indication of an existing user profile containing data files, application settings and user environment settings, wherein the user environment settings comprise a user's desktop configuration, start menu configuration or other operating system shell configurations.

The Carman reference, to the contrary, is generally directed towards a method and apparatus for storing usernames and passwords in a portable memory, wherein the usernames and passwords are for network addresses or universal resource locators (URLs). *See,* Carman reference, Abstract. Then the memory card is attached to an electronic device, such as a computer, that is attempting to access a particular URL, the user may enter the password to unlock requested information. *See id.* Once the memory card is coupled to the computer, such as via the computer's USB port, the memory of the memory card may then be accessed by entering a password to unlock the card. *See id.* at ¶¶ [0035] – [0036]. The memory card may then compare the user-entered password to stored information, and if valid, the "controller of the memory card decrypts the memory contents" which may include "decrypting the entire memory contents or simply decrypting the information as the electronic device requests it." *Id.* at ¶¶ [0037] – [0039].

The Office Action cites to a portion of the Carman reference to support its rejection of independent claim 28. *See* Office Action at p. 3 (citing FIG. 4; ¶ [0039]; ¶ [0027]). It is respectfully submitted the Carman reference does not teach or suggest scanning a storage device for a *user profile containing data files, application settings and user environment settings.* Instead, the Carman reference is generally directed toward a process for accessing a memory card. *See* Carman reference at Abstract. More particularly, the cited portions of the Carman reference describe connecting a card to an electronic device, input access request to access memory card, validation of access request, and the allowance of decryption of memory contents. *See id.* at FIG. 4. The method also includes transmitting the decrypted username and password to the requesting address. *See id.*

It is respectfully submitted that accessing a memory card to retrieve stored usernames and passwords and transmitting the information to a requesting address, such as a URL, is not even comparable to the above-recited features of independent claim 28, as amended herein. As stated, independent claim 28 scans a storage device for an existing user profile containing data files, applications settings, and user environment settings, wherein the user environment settings comprise a user's desktop configuration, start menu configuration or other operating system shell configurations. This is not explicitly, or even implicitly taught or suggested by the cited portions, nor any other portion of the Carman reference. FIG. 4 of the Carman reference is a flowchart for accessing a memory card, and includes connecting the memory card to the electronic device, receiving a request to access the memory of the memory card. *See* Carman reference at FIG. 4. If the access request is valid, "the controller of the memory card decrypts the memory contents (step 425)." *Id.* at FIG. 4; ¶ [0039]. The memory card "looks up the URL in memory to determine if the URL is present in the memory card and has an associated username and password" and if so, the username and password are transmitted to the requesting address. . ." *Id.* at ¶ [0040]. As described in the Carman reference, a storage device is not scanned for an existing user profile containing any of data files, applications settings, and user environment settings.

It is respectfully submitted that the Stegink reference fails to cure the deficiencies of the Carman reference, as the Stegink reference also fails to teach or suggest upon detecting a connection of a Portable Storage Device (PSD) to a computing device, scanning the PSD for an indication of an existing user profile containing data files, application settings and user environment settings, wherein the user environment settings comprise a user's desktop configuration, start menu configuration or other operating system shell configurations. Further,

the Stegink reference fails to teach or suggest, in response to detecting that no existing user profile is found on the PSD, automatically launching a user profile connection wizard that enables the user to create a user profile on the PSD, wherein the user profile configuration wizard allows a user to select which content data will be synchronized between the PSD and the computing device.

In contrast, the Stegink reference is generally directed toward a method for "enabling a programming device to upload a distributed software upgrade into a reprogrammable device having a unique serial number. . ." Stegink reference, Abstract. FIG. 2 of the Stegink reference illustrates a method for uploading a software upgrade to an implanted reprogrammable medical device (IRMD), such as a pacemaker. *See id.* at FIG. 2. The method includes downloading data from the IRMD into the programming device, combining data analysis and medical expertise to diagnose conditions responsive to a new therapy, selecting an appropriate upgrade, inserting a memory stick into the programming device, inputting a media identifier, entering the IRMD serial number, calculating a first enabling code from the media identifier, contacting a registry, comparing the first and second enabling codes, and enabling or aborting the upload, depending on the outcome of the comparison. *See id.* at ¶¶ [0014] – [0016].

As is evident from the above summarized description and a detailed analysis of the Stegink reference, it becomes apparent that the Stegink reference is not even directed toward a user profile that may be stored on a storage device. The Office Action states that the Stegink reference "automatically launch[es] a user profile connection wizard that enables the user to create a user profile on the PSD wherein the user profile configuration wizard allows a user to select which content data will be synchronized between the PSD and the computing device." *See* Office Action at p. 3. The cited portion of the Stegink reference states that "[i]nstallation wizard

software on the memory stick may automatically load and present screen prompts for inputs from the user." Stegink reference at ¶ [0014]. While this teaches installing new software, which is located on a memory stick, onto a computing device, it does not teach automatically launching a user profile connection wizard that enables the user to create a user profile. Further to this point, this portion of the Stegink reference, in addition to any other portion of the Stegink reference, fails to teach or suggest allowing a user to select which content data will be synchronized between the PSD and the computing device. The purpose of independent claim 28 is to make it easier for a user to work on documents and other files on one computing system, and synchronize those changes to the documents so that the most updated version can be retrieved on another computing system. This is not disclosed to be the purpose of the Stegink reference, even implicitly, which is evident by the description of the invention of the Stegink reference.

Instead, the Stegink reference allows for a "programming device to upload a distributed software upgrade into a reprogrammable device having a unique upgrade identifier." Stegink reference at ¶ [0004]. This includes calculating an enabling code, and comparing it to another enabling code received from a registry. There is no indication at all in the Stegink reference that a user can select data content to be synchronized between the storage device and the user's computing device.

Further, it is respectfully submitted that the Carman and Stegink references are not properly combinable in the manner suggested by the Office Action. More particularly, the proposed combination of references changes the principle of operation o the prior art invention being modified, and as such, the teachings of the references are not sufficient to render the claims *prima facie* obvious. *In re Ratti,* 270 F.2d 810 (CCA 1959). Specifically, the Carman reference is directed to receiving a user ID and unable to password. If no user ID or password

exists, however, then the Carman reference would not be able to implement a wizard to input a new password since this would defeat the purpose of the invention of the Carman reference. Moreover, even if Carman would implement a wizard, it would not implement a wizard of the Stegink reference, since that invention of the Stegink reference merely teaches loading additional code, of which there is no need for in the Carmen reference if there is no existing password.

Independent claim 40, as amended herein, is directed to a computer readable storage medium on which is stored computer executable instructions that cause a computer to perform a method for creating a user profile. The method includes detecting a connection of a Portable Storage Device (PSD) to a computing device, and upon detecting the connection of the PSD, scanning the PSD for an indication of an existing user profile containing data files, application settings and user environment settings. Further, the method includes, in response to detecting that no existing user profile is found on the PSD, automatically launching a user profile connection wizard. The method further includes receiving input from the user profile configuration wizard from the user selecting which content data will be synchronized between the PSD and the computing device. Additionally, the method includes storing the selected content data on the PSD in association with a new user profile, and in response to the user input, synchronizing the selected content data between the PSD and the computing device.

It is respectfully submitted that the Carman reference fails to teach or suggest, detecting a connection of a Portable Storage Device (PSD) to a computing device, and upon detecting the connection of the PSD, scanning the PSD for an indication of an existing user profile containing data files, application settings and user environment settings.

The Carman reference, to the contrary, is generally directed towards a method and apparatus for storing usernames and passwords in a portable memory, wherein the usernames

and passwords are for network addresses or universal resource locators (URLs). *See,* Carman reference, Abstract. Then the memory card is attached to an electronic device, such as a computer, that is attempting to access a particular URL, the user may enter the password to unlock requested information. *See id.* Once the memory card is coupled to the computer, such as via the computer's USB port, the memory of the memory card may then be accessed by entering a password to unlock the card. *See id.* at ¶¶ [0035] – [0036]. The memory card may then compare the user-entered password to stored information, and if valid, the "controller of the memory card decrypts the memory contents" which may include "decrypting the entire memory contents or simply decrypting the information as the electronic device requests it." *Id.* at ¶¶ [0037] – [0039].

The Office Action cites to a portion of the Carman reference to support its rejection of independent claim 40. *See* Office Action at p. 3 (citing FIG. 4; ¶ [0039]; ¶ [0027]). It is respectfully submitted the Carman reference does not teach or suggest scanning a storage device for a ***user profile containing data files, application settings and user environment settings.*** Instead, the Carman reference is generally directed toward a process for accessing a memory card. *See* Carman reference at Abstract. More particularly, the cited portions of the Carman reference describe connecting a card to an electronic device, input access request to access memory card, validation of access request, and the allowance of decryption of memory contents, the memory contents including stored usernames and passwords. *See id.* at FIG. 4. The method also includes transmitting the decrypted username and password to the requesting address. *See id.*

It is respectfully submitted that accessing a memory card to retrieve stored usernames and passwords and transmitting the information to a requesting address, such as a

URL, is not even comparable to the above-recited features of independent claim 40, as amended herein. As stated, independent claim 40 scans a storage device for an existing user profile containing data files, applications settings, and user environment settings. This is not explicitly, or even implicitly taught or suggested by the cited portions, nor any other portion of the Carman reference. FIG. 4 of the Carman reference is a flowchart for accessing a memory card, and includes connecting the memory card to the electronic device, receiving a request to access the memory of the memory card. *See* Carman reference at FIG. 4. If the access request is valid, "the controller of the memory card decrypts the memory contents (step 425)." *Id.* at FIG. 4; ¶ [0039]. The memory card "looks up the URL in memory to determine if the URL is present in the memory card and has an associated username and password" and if so, the username and password are transmitted to the requesting address. . ." *Id.* at ¶ [0040]. As described in the Carman reference, a storage device is not scanned for an existing user profile containing any of data files, applications settings, and user environment settings.

It is respectfully submitted that the Stegink reference fails to cure the deficiencies of the Carman reference, as the Stegink reference also fails to teach or suggest, at least, detecting a connection of a Portable Storage Device (PSD) to a computing device, and upon detecting the connection of the PSD, scanning the PSD for an indication of an existing user profile containing data files, application settings and user environment settings. Further, the Stegink reference fails to teach or suggest, in response to detecting that no existing user profile is found on the PSD, automatically launching a user profile connection wizard, receiving input from the user profile configuration wizard from the user selecting which content data will be synchronized between the PSD and the computing device, storing the selected content data on the PSD in association

with a new user profile, and in response to the user input, synchronizing the selected content data between the PSD and the computing device.

In contrast, the Stegink reference is generally directed toward a method for "enabling a programming device to upload a distributed software upgrade into a reprogrammable device having a unique serial number. . ." Stegink reference, Abstract. FIG. 2 of the Stegink reference illustrates a method for uploading a software upgrade to an implanted reprogrammable medical device (IRMD), such as a pacemaker. *See id.* at FIG. 2. The method includes downloading data from the IRMD into the programming device, combining data analysis and medical expertise to diagnose conditions responsive to a new therapy, selecting an appropriate upgrade, inserting a memory stick into the programming device, inputting a media identifier, entering the IRMD serial number, calculating a first enabling code from the media identifier, contacting a registry, comparing the first and second enabling codes, and enabling or aborting the upload, depending on the outcome of the comparison. *See id.* at ¶¶ [0014] – [0016].

As is evident from the above summarized description and a detailed analysis of the Stegink reference, it becomes apparent that the Stegink reference is not even directed toward a user profile that may be stored on a storage device. The Office Action states that the Stegink reference "automatically launch[es] a user profile connection wizard that enables the user to create a user profile on the PSD wherein the user profile configuration wizard allows a user to select which content data will be synchronized between the PSD and the computing device." *See* Office Action at p. 3. The cited portion of the Stegink reference states that "[i]nstallation wizard software on the memory stick may automatically load and present screen prompts for inputs from the user." Stegink reference at ¶ [0014]. While this teaches installing new software, which is located on a memory stick, onto a computing device, it does not teach automatically launching a

user profile connection wizard that enables the user to create a user profile. Further to this point, this portion of the Stegink reference, in addition to any other portion of the Stegink reference, fails to teach or suggest allowing a user to select which content data will be synchronized between the PSD and the computing device. The purpose of independent claim 40 is to make it easier for a user to work on documents and other files on one computing system, and synchronize those changes to the documents so that the most updated version can be retrieved on another computing system. This is not disclosed to be the purpose of the Stegink reference, even implicitly, which is evident by the description of the invention of the Stegink reference.

Instead, the Stegink reference allows for a "programming device to upload a distributed software upgrade into a reprogrammable device having a unique upgrade identifier." Stegink reference at ¶ [0004]. This includes calculating an enabling code, and comparing it to another enabling code received from a registry. There is no indication at all in the Stegink reference that a user can select data content to be synchronized between the storage device and the user's computing device.

Further, it is respectfully submitted that the Carman and Stegink references are not properly combinable in the manner suggested by the Office Action. More particularly, the proposed combination of references changes the principle of operation o the prior art invention being modified, and as such, the teachings of the references are not sufficient to render the claims *prima facie* obvious. *In re Ratti*, 270 F.2d 810 (CCA 1959). Specifically, the Carman reference is directed to receiving a user ID and unable to password. If no user ID or password exists, however, then the Carman reference would not be able to implement a wizard to input a new password since this would defeat the purpose of the invention of the Carman reference. Moreover, even if Carman would implement a wizard, it would not implement a wizard of the

Stegink reference, since that invention of the Stegink reference merely teaches loading additional

code, of which there is no need for in the Carmen reference if there is no existing password.

Independent claim 52, as amended herein, is directed towards a computer

comprising a processor and a memory including computer executable instructions that cause the

computer to perform a method for creating a user profile. The method includes detecting a

connection of a Portable Storage Device (PSD) to a computing device, and upon detecting the

connection of the PSD, scanning the PSD for an indication of an existing user profile containing

data files, application settings and user environment settings. Further, the method includes, in

response to detecting that no existing user profile is found on the PSD, automatically launching a

user profile connection wizard. and receiving input from the user profile configuration wizard

from the user selecting which content data will be synchronized between the PSD and the

computing device. The method additionally includes storing the selected content data on the

PSD in association with a new user profile, and in response to the user input, synchronizing the

selected content data between the PSD and the computing device.

It is respectfully submitted that the Carman reference fails to teach or suggest,

detecting a connection of a Portable Storage Device (PSD) to a computing device, and upon

detecting the connection of the PSD, scanning the PSD for an indication of an existing user

profile containing data files, application settings and user environment settings.

The Carman reference, to the contrary, is generally directed towards a method and

apparatus for storing usernames and passwords in a portable memory, wherein the usernames

and passwords are for network addresses or universal resource locators (URLs). *See,* Carman

reference, Abstract. Then the memory card is attached to an electronic device, such as a

computer, that is attempting to access a particular URL, the user may enter the password to

unlock requested information. *See id.* Once the memory card is coupled to the computer, such as via the computer's USB port, the memory of the memory card may then be accessed by entering a password to unlock the card. *See id.* at ¶¶ [0035] – [0036]. The memory card may then compare the user-entered password to stored information, and if valid, the "controller of the memory card decrypts the memory contents" which may include "decrypting the entire memory contents or simply decrypting the information as the electronic device requests it." *Id.* at ¶¶ [0037] – [0039].

The Office Action cites to a portion of the Carman reference to support its rejection of independent claim 52. *See* Office Action at p. 3 (citing FIG. 4; ¶ [0039]; ¶ [0027]). It is respectfully submitted the Carman reference does not teach or suggest scanning a storage device for a ***user profile containing data files, application settings and user environment settings.*** Instead, the Carman reference is generally directed toward a process for accessing a memory card. *See* Carman reference at Abstract. More particularly, the cited portions of the Carman reference describe connecting a card to an electronic device, input access request to access memory card, validation of access request, and the allowance of decryption of memory contents, the memory contents including stored usernames and passwords. *See id.* at FIG. 4. The method also includes transmitting the decrypted username and password to the requesting address. *See id.*

It is respectfully submitted that accessing a memory card to retrieve stored usernames and passwords and transmitting the information to a requesting address, such as a URL, is not even comparable to the above-recited features of independent claim 52, as amended herein. As stated, independent claim 52 scans a storage device for an existing user profile containing data files, applications settings, and user environment settings. This is not explicitly,

or even implicitly taught or suggested by the cited portions, nor any other portion of the Carman reference. FIG. 4 of the Carman reference is a flowchart for accessing a memory card, and includes connecting the memory card to the electronic device, receiving a request to access the memory of the memory card. *See* Carman reference at FIG. 4. If the access request is valid, "the controller of the memory card decrypts the memory contents (step 425)." *Id.* at FIG. 4; ¶ [0039]. The memory card "looks up the URL in memory to determine if the URL is present in the memory card and has an associated username and password" and if so, the username and password are transmitted to the requesting address. . ." *Id.* at ¶ [0040]. As described in the Carman reference, a storage device is not scanned for an existing user profile containing any of data files, applications settings, and user environment settings.

It is respectfully submitted that the Stegink reference fails to cure the deficiencies of the Carman reference, as the Stegink reference also fails to teach or suggest, at least, detecting a connection of a Portable Storage Device (PSD) to a computing device, and upon detecting the connection of the PSD, scanning the PSD for an indication of an existing user profile containing data files, application settings and user environment settings. Further, the Stegink reference fails to teach or suggest, in response to detecting that no existing user profile is found on the PSD, automatically launching a user profile connection wizard, receiving input from the user profile configuration wizard from the user selecting which content data will be synchronized between the PSD and the computing device, storing the selected content data on the PSD in association with a new user profile, and in response to the user input, synchronizing the selected content data between the PSD and the computing device.

In contrast, the Stegink reference is generally directed toward a method for "enabling a programming device to upload a distributed software upgrade into a reprogrammable

device having a unique serial number. . ." Stegink reference, Abstract. FIG. 2 of the Stegink reference illustrates a method for uploading a software upgrade to an implanted reprogrammable medical device (IRMD), such as a pacemaker. *See id.* at FIG. 2. The method includes downloading data from the IRMD into the programming device, combining data analysis and medical expertise to diagnose conditions responsive to a new therapy, selecting an appropriate upgrade, inserting a memory stick into the programming device, inputting a media identifier, entering the IRMD serial number, calculating a first enabling code from the media identifier, contacting a registry, comparing the first and second enabling codes, and enabling or aborting the upload, depending on the outcome of the comparison. *See id.* at ¶¶ [0014] – [0016].

As is evident from the above summarized description and a detailed analysis of the Stegink reference, it becomes apparent that the Stegink reference is not even directed toward a user profile that may be stored on a storage device. The Office Action states that the Stegink reference "automatically launch[es] a user profile connection wizard that enables the user to create a user profile on the PSD wherein the user profile configuration wizard allows a user to select which content data will be synchronized between the PSD and the computing device." *See* Office Action at p. 3. The cited portion of the Stegink reference states that "[i]nstallation wizard software on the memory stick may automatically load and present screen prompts for inputs from the user." Stegink reference at ¶ [0014]. While this teaches installing new software, which is located on a memory stick, onto a computing device, it does not teach automatically launching a user profile connection wizard that enables the user to create a user profile. Further to this point, this portion of the Stegink reference, in addition to any other portion of the Stegink reference, fails to teach or suggest allowing a user to select which content data will be synchronized between the PSD and the computing device. The purpose of independent claim 52 is to make it

easier for a user to work on documents and other files on one computing system, and synchronize those changes to the documents so that the most updated version can be retrieved on another computing system. This is not disclosed to be the purpose of the Stegink reference, even implicitly, which is evident by the description of the invention of the Stegink reference.

Instead, the Stegink reference allows for a "programming device to upload a distributed software upgrade into a reprogrammable device having a unique upgrade identifier." Stegink reference at ¶ [0004]. This includes calculating an enabling code, and comparing it to another enabling code received from a registry. There is no indication at all in the Stegink reference that a user can select data content to be synchronized between the storage device and the user's computing device.

Further, it is respectfully submitted that the Carman and Stegink references are not properly combinable in the manner suggested by the Office Action. More particularly, the proposed combination of references changes the principle of operation o the prior art invention being modified, and as such, the teachings of the references are not sufficient to render the claims *prima facie* obvious. *In re Ratti,* 270 F.2d 810 (CCA 1959). Specifically, the Carman reference is directed to receiving a user ID and unable to password. If no user ID or password exists, however, then the Carman reference would not be able to implement a wizard to input a new password since this would defeat the purpose of the invention of the Carman reference. Moreover, even if Carman would implement a wizard, it would not implement a wizard of the Stegink reference, since that invention of the Stegink reference merely teaches loading additional code, of which there is no need for in the Carmen reference if there is no existing password.

As such, it is respectfully submitted that the Carman and Stegink references, whether taken alone or in combination, fail to teach or suggest all of the limitations of

independent claims 28, 40, and 52, as amended herein, and as such, a *prima facie* case of obviousness of claims 28. 40, and 52 cannot be established utilizing these references. Accordingly, Applicant respectfully requests withdrawal of the rejection of independent claims 28, 40, and 52 under 35 U.S.C. §103(a). Independent claims 28, 40, and 52 are believed to be in condition for allowance and such favorable action is respectfully requested.

Claims 30-35, 41-47, and 53-59 depend, either directly or indirectly, from one of independent claims 28, 40, or 52 and, accordingly, it is respectfully submitted that the Carman and Stegink references fail to teach or suggest all of the limitations of these claims for at least the above-cited reasons. As such, the withdrawal of the § 103(a) rejections of claims 30-35, 41-47, and 53-59 is respectfully requested. Each of claims 30-35, 41-47, and 53-59 is believed to be in condition for allowance, and such favorable action is respectfully requested.

C.) **Obviousness Rejection Based on the Carman Reference, in view of the Stegink Reference, in further view of U.S. Publication No. 2003/0028451 to Ananian**

Claims 36-37, 48-49, and 60-61 are rejected under 35 U.S.C. § 103(a) as being unpatentable over the Carman reference, in view of the Stegink reference, and in further view of U.S. Publication No. 2003/0028451 to Ananian (hereinafter the "Ananian reference"). As the Carman, Stegink, and Ananian references, either alone or in combination, fail to teach or suggest all of the claim limitations of claims 36-37, 48-49, and 60-61, Applicants respectfully traverse this rejection, as hereinafter set forth.

Claims 36-37, 48-49, and 60-61 depend, either directly or indirectly, from one of claims 28, 40, or 52, and are therefore patentable over the Carman, Stegink, and Ananian references for at least the reasons cited above. Moreover, claims 36-37, 48-49, and 60-61 recite further novel, non-obvious features not taught or suggested in the cited references in the context

of independent claims 28, 40, and 52. Accordingly, Applicants respectfully request withdrawal of the § 103(a) rejections of claims 36-37, 48-49, and 60-61 as well. Claims 36-37, 48-49, and 60-61 are believed to be in condition for allowance and such favorable action is respectfully requested.

D.) <u>Obviousness Rejection Based on the Carman reference, in view of the Stegink reference, in further view of U.S. Publication No. 2003/0154282 to Horvitz</u>

Claims 38-39, 50-51 and 62-63 are rejected under 35 U.S.C. § 103(a) as being unpatentable over the Carman reference, in view of the Stegink reference, and in further view of U.S. Publication No. 2003/0154282 to Horvitz (hereinafter the "Horvitz reference"). As the Carman, Stegink, and Horvitz references, either alone or in combination, fail to teach or suggest all of the claim limitations of claims 38-39, 50-51, and 62-63, Applicants respectfully traverse this rejection, as hereinafter set forth.

Claims 38-39, 50-51, and 62-63 depend, either directly or indirectly, from one of claims 28, 40, or 52, and are therefore patentable over the Carman, Stegink, and Horvitz references for at least the reasons cited above. Moreover, claims 38-39, 50-51, and 62-63 recite further novel, non-obvious features not taught or suggested in the cited references in the context of independent claims 28, 40, and 52. Accordingly, Applicants respectfully request withdrawal of the § 103(a) rejections of claims 38-39, 50-51, and 62-63 as well. Claims 38-39, 50-51, and 62-63 are believed to be in condition for allowance and such favorable action is respectfully requested.

CONCLUSION

For at least the reasons stated above, claims 28 and 30-63 are now in condition for allowance. Applicants respectfully request withdrawal of the pending rejections and allowance of the claims. If any issues remain that would prevent issuance of this application, the Examiner is urged to contact the undersigned – 816-474-6550 or emcfarland@shb.com (such communication via email is herein expressly granted) – to resolve the same. It is believed that no fee is due, however, the Commissioner is hereby authorized to charge any amount required to Deposit Account No. 19-2112.

Respectfully submitted,

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